

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

)

CRIMINAL NO. 1:04CR215

)

v.

Count 1  
18 USC § 371  
(Conspiracy)

)

)

JOSE VICENTE MENDEZ-TENIAS

Counts 2-8  
18 USC §§ 1001(a)(3) & 2  
(False Statements & Aiding & Abetting)

)

)

and

Counts 9-15  
18 USC §§ 1546(a) & 2  
(VISA Fraud & Aiding & Abetting)

)

GLOBAL EVANGELISM TASK

FORCE, ) a District of Columbia

corporation )

Counts 16-22  
18 USC §§ 1341 & 2  
(Mail Fraud & Aiding & Abetting)

)

16714 Friar Loop

)

Dumfries, Virginia

Count 23  
8 USC § 1324 (a)(1)(A)(iii), 18 USC § 2  
(Harboring illegal aliens & Aiding & Abetting)

)

)

Defendants

)

INDICTMENT

MAY 2004 TERM - at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

Between in or about January 2000, and continuing through in or about November 2003,  
at Dumfries, Virginia, in the Eastern District of Virginia, and elsewhere, the defendants,

JOSE VICENTE MENDEZ-TENIAS, and the GLOBAL EVANGELISM TASK FORCE, the defendants, did knowingly and willfully combine, conspire, confederate and agree together and with various other persons known and unknown to the Grand Jury to commit the following offenses:

1. To defraud the United States by impeding, impairing, obstructing, and defeating the lawful functions of the United States Department of Homeland Security (DHS), and the United States Department of Justice, including but not limited to the Citizenship and Immigration Services (CIS), an agency under DHS within the executive branch of the government of the United States, and the Immigration and Naturalization Service (INS) previously under the United States Department of Justice, in their operation, supervision and administration of their applicable immigration programs.

2. To devise and intend to devise a scheme and artifice to defraud, and for obtaining money, immigration benefits, and property from DHS, and the United States Department of Justice, by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing scheme and artifice and attempting so to do, placing in any post office and authorized depository for mail matter to be sent and delivered by the Postal Service, and deposits and causes to be deposited any matter to be sent and delivered by any private or commercial interstate carrier,, in violation of Title 18, United States Code, Section 1341;

3. To knowingly and unlawfully, forge, counterfeit, alter, and falsely make documents prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, namely Form I-360 petitions (special immigrant petitions for religious workers), and utter and use such documents, knowing them to be forged, counterfeited,

altered, falsely made, and to have been procured by means of false statements, procured by fraud, and unlawfully obtained; in violation of Title 18, United States Code, Section 1546;

4. To knowingly and in reckless disregard of the fact that aliens have come to, entered, and remained in the United States in violation of law, conceal, harbor, and shield from detection, such aliens in places, including buildings and means of transportation, in violation of Title 8, United States Code, Section 1324 (a)(1)(A)(iii); and

5. In a matter within the jurisdiction of DHS (and INS), an agency within the executive branch of the Government of the United States, to knowingly and willfully make, use, and cause to be made, a false writing and document, knowing the same to contain materially false, fictitious and fraudulent statements and entries; in violation of Title 18, United States Code, Section 1001 (a)(3).

**A. General Allegations Concerning the Defendant and the Special Immigrant Process**

At all times material to this indictment:

1. The defendant, JOSE VICENTE MENDEZ-TENIAS, was the Executive Director and President of Global Evangelism Task Force (hereinafter GETF), a District of Columbia corporation operating at 16714 Friar Loop, Dumfries, Virginia, in the Eastern District of Virginia.

2. CIS is an agency under DHS within the executive branch of the government of the United States. Its predecessor, INS, was an agency under the United States Department of Justice within the executive branch of the United States.

3. An alien seeking to immigrate to the United States could apply for an immigrant visa as a special immigrant religious worker in the United States, using Form I-360. If approved, this

employment-based visa allowed the alien to come to the United States and to apply for lawful permanent residence in the United States.

4. In order to receive an immigrant visa to perform special immigrant religious work, the alien and the prospective employer first had to meet the requirements as set forth by governing laws and regulations.

5. The alien must establish: that for at least two years immediately preceding the time of petition for admission, has been a member of a religious denomination having a bona fide nonprofit, religious organization in the United States; that the alien seeks to enter the United States solely to pursue the vocation of a minister of that religious denomination; and that the two years prior experience must have been full-time paid employment in the same position as the religious worker petition.

6. The petitioner must establish that the proposed position qualifies as a religious occupation for the purpose of special immigrant classification and that the position is traditionally a permanent, full-time, salaried occupation within the denomination. Any petition filed by or for an employment-based immigrant who requires an offer of employment must be accompanied by evidence that the prospective United States employer has the ability to pay the wage. The employer must provide evidence that the organization qualifies as a nonprofit organization in the form of documentation showing that it is exempt from taxation in accordance with section 501C(3) of the Internal Revenue Code of 1986 as it relates to religious organization (sections 509(a)(1) and 170(b)(A)(1) of the code as a church).

7. Both the alien and the prospective employer could engage an attorney or authorized representative to represent their respective interests during the application process for the

immigrant visa. If the alien or the prospective employer engaged an attorney or authorized representative, the representative had to sign and file a notice of appearance with the CIS or INS.

8. If the CIS or INS approved the Form I-360 and the alien was in the United States lawfully at that time, the alien could then adjust his status to that of a lawful permanent resident by filing an Application to Register Permanent Residency or Adjustment of Status, officially known as INS Form I-485, with CIS or INS. An alien unlawfully in the United States could also use an approved Form I-360 to adjust his/her status to that of a lawful permanent resident by filing an I-485 with the CIS or INS, but only if the alien's prospective employer submitted the underlying petition for special immigrant religious worker prior to April 30, 2001.

9. A lawful permanent resident may work and live in the United States indefinitely and, should he/she so choose, apply for United States citizenship.

10. A Form I-360 with supporting documentation is a petition required by the United States Citizenship and Immigration laws of the United States and the rules and regulations prescribed thereunder.

11. Between on or about January 2000, and continuing until November, 2003, GETF operated as a immigration assistance center at its principal place of business in Dumfries, Virginia, located within the Eastern District of Virginia, and was engaged in the business of providing immigration consulting services to individuals and to provide and to submit documents for illegal aliens and other individuals for an adjustment of their legal status.

12. Until approximately November, 2003, GETF in Dumfries, Virginia, was owned by JOSE VICENTE MENDEZ-TENIAS.

13. JOSE VICENTE MENDEZ-TENIAS had primary responsibility over the business and billing procedures of the GETF.

14. JOSE VICENTE MENDEZ-TENIAS was not an attorney licensed to practice law in the State of Virginia.

15. JOSE VICENTE MENDEZ-TENIAS controlled and administered the operations of the GETF.

16. During the period January 2000, through the date of this Indictment, JOSE VICENTE MENDEZ-TENIAS represented himself as the owner of the GETF, and performed the duties consistent with an owner, manager, and administrator of the GETF.

17. CIS, and previously INS, administered immigration programs, providing immigration benefits to eligible aliens or candidates under various programs.

18. A Virginia attorney, or other authorized practitioner, providing immigration services covered by CIS or INS would submit an application, petition, or claim for benefit to CIS or INS, on a specific form relating to the benefit sought, e.g. Form I-360 for an adjustment of status for religious workers. This form called for the submission of certain information relating to the immigrant beneficiary, including but not limited to educational degrees and/or training, previous employment verifications, and a certification by the prospective sponsor or sponsors.

19. The Form I-360 specifically stated on the reverse side what the attorney or practitioner certification block represents, it states, "I certify, or, if outside the United States, I swear or affirm, under penalty of perjury under the laws of the United States of America, that this petition, and the evidence submitted with it, is all true and correct. If filing this on behalf of an organization, I certify that I am empowered to do so by that organization. I authorize the

release of any information from my records, or from the petitioning organization's records, which the Immigration and Naturalization Service needs to determine eligibility for the benefit being sought."

20. The Form I-360 specifically stated on the reverse side what the person preparing the form, if other than the attorney or practitioner listed as certifying the application, block represents, it states, " I declare that I prepared this application at the request of the above person and it is based on all information of which I have knowledge."

21. At all times pertinent to this Indictment, the Title 8, Code of Federal Regulations, Section 204.5(m), et seq. was in full effect, and had established the special immigrant religious worker program which provides the requirements for eligibility for individuals who may be eligible to receive the benefits of this program.

22. Defendants JOSE VICENTE MENDEZ-TENIAS and the GETF submitted applications/petitions to various service centers of the CIS or INS by the United States mails and/or by Federal Express (Fedex), a private and commercial interstate carrier, and the CIS or INS routinely mailed correspondence, documents, letters, and/or responses by United States mails to the GETF office at 16714 Friar Loop, Dumfries, Virginia.

23. Defendants JOSE VICENTE MENDEZ-TENIAS and the GETF received correspondence, documents, letters, and/or responses to the applications and/or petitions from CIS or INS via the United States mails at the GETF office located at 16714 Friar Loop, Dumfries, Virginia.

## **B. Manner And Means**

1. It was part of the conspiracy that the defendants and others would and did submit over one hundred false and fraudulent Form I-360 applications and other documents through the United States mails or private or commercial interstate carrier for the purposes of sponsoring or assisting a purported sponsor for the adjustment of an alien's status as a special immigrant religious worker when, in truth and fact, the aliens in most cases, did not qualify for the benefit or adjustment in status requested.

2. It was further part of the conspiracy that the defendants and others would and did make documents in support of over one hundred I-360 applications depicting a false and fraudulent employment history for the alien to be sponsored in the application. For example, testimonial letters and documents were found in several alien files which indicated that the alien was a paid minister for a religious organization for two years prior to entry into the United States as required by statute and regulation.

3. It is further part of the conspiracy that defendants and others would and did attempt to carry out their scheme to defraud the government departments and agencies by making documents in support of over one hundred I-360 applications depicting a false and fraudulent educational degrees for the alien to be sponsored in the application. For example, diplomas and other documents were found in several alien files which indicated that the alien received a baccalaureate degree as required by statute and regulation.

4. It is further part of the conspiracy that defendants and others would and did attempt to carry out their scheme to defraud the aforementioned departments and agencies by making documents in support of over one hundred I-360 applications depicting a false and fraudulent

educational training and certification for the alien to be sponsored in the application. For example, the training certificates and other documents were found in several alien files which indicated that the alien received a religious training certification or degree as required by statute and regulation.

5. It is further part of the conspiracy that defendants and others would and did attempt to carry out their scheme to defraud the aforementioned departments and agencies by making documents in support of over one hundred I-360 applications depicting a false and fraudulent employment offers for the alien to be sponsored in the application. For example, the documents were found in several alien files which indicated that the alien received an employment offer from a bona fide religious organization for a full-time paid position as required by statute and regulation.

6. It is further a part of the conspiracy that defendants and others would fraudulently bill over one hundred different aliens between \$1000 and \$3000 for their immigration consulting services for benefits that the alien did not and could not receive.

7. It is further a part of the conspiracy that defendants and others would receive payments from the aliens in cash, checks that were immediately cashed, or direct wire transfers from the alien's bank to the defendant's bank.

### **C. Overt Acts**

In furtherance of and to effect the objectives of the conspiracy, and to accomplish its purpose and objectives, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

(1) In or about November 1997, defendant JOSE VICENTE MENDEZ-TENIAS incorporated and opened the GETF office in Washington, D.C. and later at his home office in Dumfries, Virginia.

(2) On or about November 13, 2001, defendant JOSE VICENTE MENDEZ-TENIAS, received a wire transfer from Wells Fargo Bank to his account at Bank of America showing a \$1000.00 deposit from Manuel D. Francia-Lopez for first payment for immigration services provided by JOSE VICENTE MENDEZ-TENIAS.

(3) On or about November 23, 2001, defendant JOSE VICENTE MENDEZ-TENIAS, received a wire transfer from Wells Fargo Bank to his account at Bank of America showing a \$1000.00 deposit from Manuel D. Francia-Lopez for final payment for immigration services provided by JOSE VICENTE MENDEZ-TENIAS.

(4) On or about May 16, 2001, defendants JOSE VICENTE MENDEZ-TENIAS and the GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Liliam A. Vasquez de Velasco, file #SRC 01 174 5329, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(5) On or about September 14, 2001, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Cecilia Francis-Riquelme, file #EAC 01 279 50272, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(6) On or about December 7, 2001, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Manuel Francia-Lopez, file #LIN 02 060 52490, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(7) In or about 2002, JOSE VICENTE MENDEZ-TENIAS advertised about GETF in the Hispanic publication La Fe En Marcha, where he stated that he provides immigration services, including filing religious worker petitions.

(8) On or about June 25, 2002, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Luis A. Juarez-Rosales, file #SRC 02 211 50085, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(9) On or about July 11, 2002, defendant JOSE VICENTE MENDEZ-TENIAS, received a wire transfer from Wells Fargo Bank to his account at Bank of America showing a \$1000.00 deposit from Alejandro Soria-Sanchez for the first payment for immigration services provided by JOSE VICENTE MENDEZ-TENIAS for Alejandro Soria-Sanchez.

(10) On or about August 6, 2002, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Zulma Valenzuela de Castillo, file #LIN 02 254 52888, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(11) In or about October 2002, JOSE VICENTE MENDEZ-TENIAS posted a full-page advertisement about GETF in the Hispanic publication Camino, Luz, Y Vida, where he stated that he provided immigration services, including filing religious worker petitions.

(12) In or about May 2001, JOSE VICENTE MENDEZ-TENIAS opened the web site of GETF ([www.globalevangelism.cjb.net](http://www.globalevangelism.cjb.net)), with JOSE VICENTE MENDEZ-TENIAS and the GETF advertising that JOSE VICENTE MENDEZ-TENIAS and the GETF provided immigration services and other issues related to immigration.

(13) On or about October 17, 2002, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Arturo Vargas-Gutierrez, file #LIN 03 012 52549, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned;

(14) On or about November 14, 2002, defendant JOSE VICENTE MENDEZ-TENIAS, received a wire transfer from Wells Fargo Bank to his account at Bank of America showing a \$1000.00 deposit on behalf of Alejandro Soria-Sanchez as the final payment for immigration services provided by JOSE VICENTE MENDEZ-TENIAS for Alejandro Soria-Sanchez.

(15) On or about March 21, 2003, defendants JOSE VICENTE MENDEZ-TENIAS and GETF submitted or caused to be submitted to INS an envelope containing an I-360 application and supporting documents for beneficiary, Alejandro Soria-Sanchez, file #LIN 03 137 050116, purportedly claiming that the beneficiary met the requirements under the laws and regulations for the benefits petitioned.

(16) Between on or about August 2002 and November 2003, defendants JOSE VICENTE MENDEZ-TENIAS and GETF harbored illegal aliens at his residence/office in Dumfries, Virginia.

(In violation of Title 18, United States Code, Section 371.)

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about January 2000, and continuing through November 2003, in the Eastern District of Virginia, the defendants, JOSE VICENTE MENDEZ-TENIAS and GLOBAL EVANGELISM TASK FORCE (GETF), a District of Columbia corporation, in a matter within the jurisdiction of DHS (and previously INS), an agency within the executive branch of the Government of the United States, did knowingly and willfully make, use, and cause to be made, a false writing and document, knowing the same to contain materially false, fictitious and fraudulent statements and entries.
2. Paragraphs 1 through 23 of the general allegations contained in Count 1 of this indictment are specifically re-alleged and incorporated in these counts, as if set forth in full.
3. Specifically, on or about the dates listed below, in the Eastern District of Virginia, the defendants, represented, in the below listed Petitions and supporting documentation for Amerasian, Widow or Special Immigrant (INS Form I-360) specified below, knowing the same to contain false, fictitious and fraudulent material statements and entries, The defendants prepared and submitted each petition as if it were a legitimate petition filed on behalf of the religious organization with the respective beneficiary named in the petition. In fact, each petition listed below was fraudulent and contained numerous falsehoods, including forged signatures and/or declarations, false assertions that the defendants represented the various religious denominational organizations; and/or fraudulent credentials about the beneficiary ' s educational background, work experience and qualifications.

Count	Date	Beneficiary	Petitioner
2	April 19, 2001	Liliam A. Vasquez de Velasco	Pentecostal Church of God Prince of Peace

3	Sep 14, 2001	Cecilia Francis-Riquelme	Pentecostal Church of God Bethel
4	Dec 7, 2001	Manuel Francia-Lopez	Church of God Christian Center Emanuel
5	Jun 25, 2002	Luis A. Juarez-Rosales	Pentecostal Church of God Hispanic Office for Eastern USA
6	Aug 6, 2002	Zulma Valenzuela de Castillo	Hispanic Pentecostal Church of God
7	Oct 17, 2002	Arturo Vargas-Gutierrez	Hispanic Pentecostal Church of God
8	Mar 21,2003	Alejandro D. Soria-Sanchez	Church of God "Ebenezer"

(In violation of Title 18, United States Code, Sections 1001(a)(3) and 2.)

**Counts 9-16Counts 1 B 71 Immigration Fraud**

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about January 2000, and continuing through in or about November 2003, in the Eastern District of Virginia, the defendants, JOSE VICENTE MENDEZ-TENIAS and GETF, a District of Columbia corporation, as permitted under penalty of perjury under section 1746 of Title 28, knowingly subscribed as true, false statements with respect to a material fact in the applications and other documents, namely the I-360 petitions and supporting documentation for Amerasian, Widow or Special Immigrant, which applications and other documents were required by the Immigration laws and the regulations prescribed thereunder, and knowingly presented such applications and other documents which contained such false statements and which failed to contain any reasonable basis in law and fact, and knowingly aided and abetted such false statements.

2. Paragraphs 1 through 23 of the general allegations contained in Count 1 of this indictment are specifically re-alleged and incorporated in these counts, as if set forth in full.

3. Specifically, each petition listed below was fraudulent in that it contained forged signatures and/or declarations, false assertions that the defendant represented the various religious denominational organizations, and/or fraudulent credentials about the beneficiary ' s educational background, work experience and qualifications.

Count	Date	Beneficiary	Petitioner
9	April 19, 2001	Liliam A. Vasquez de Velasco	Pentecostal Church of God Prince of Peace
10	Sep 14, 2001	Cecilia Francis-Riquelme	Pentecostal Church of God Bethel

11	Dec 7, 2001	Manuel Francia-Lopez	Church of God Christian Center Emanuel
12	Jun 25, 2002	Luis A. Juarez-Rosales	Pentecostal Church of God Hispanic Office for Eastern USA
13	Aug 6, 2002	Zulma Valenzuela de Castillo	Hispanic Pentecostal Church of God
14	Oct 17, 2002	Arturo Vargas-Gutierrez	Hispanic Pentecostal Church of God
15	Mar 21,2003	Alejandro D. Soria-Sanchez	Church of God "Ebenezer"

(In violation of Title 18, United States Code, Sections 1546(a) and 2.)

**Counts 16-22   Mail Fraud**

**THE GRAND JURY FURTHER CHARGES THAT:**

From in or about January 2000 through in or about November 2003, in the Eastern District of Virginia and elsewhere, the defendants, JOSE VICENTE MENDEZ-TENIAS and GLOBAL EVANGELISM TASK FORCE (GETF), a District of Columbia corporation, knowingly devised and intended to devise a scheme and artifice to defraud, and for obtaining money, immigration benefits, and property from the United States Department of Homeland Security, and the United States Department of Justice, by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing scheme and artifice and attempting so to do, placed in post offices and authorized depositories for mail matter to be sent and delivered by the Postal Service, and deposited and caused to be deposited matter to be sent and delivered by private or commercial interstate carrier, in violation of Title 18, United States Code, Section 1341

**A. INTRODUCTION**

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 23 of the general allegations contained in Count 1 of this indictment as if set forth in full, and further charges that:

**B. THE SCHEME**

1. The substance of the scheme to defraud, and its manner and means as described in Part B of Count 1 of this Indictment, and those paragraphs are realleged and incorporated by reference as though fully set forth herein.

**C. THE MAILINGS**

1. On or about the dates set forth below for each Count, in the Eastern District of Virginia, JOSE VICENTE MENDEZ-TENIAS, and GLOBAL EVANGELISM TASK FORCE (GETF), a District of Columbia corporation, the defendants, for the purpose of executing the aforesaid

scheme and artifice and attempting to do so, knowingly caused mail matter, specifically I-360 petitions and supporting documentation for Amerasian, Widow or Special Immigrant, to be sent from or delivered within the Eastern District Virginia by the United States Postal Service or by private or commercial carrier as further described below under Mail Matter:

<b>COUNT</b>	<b>DATE</b>	<b>MAIL MATTER</b>
16	April 19, 2001 mailed/fedexed from the Eastern District of Virginia to INS, Dallas, TX	Envelope containing an I-360 application and supporting documents for beneficiary Liliam A. Vasquez de Velasco, file # SRC 01 174 53291
17	Sep 14, 2001 mailed/fedexed from the Eastern District of Virginia to INS, Burlington, VT	Envelope containing a I-360 application and supporting documents for beneficiary Cecilia Francis-Riquelme, file # EAC 01-279 50272
18	Dec 7, 2001 mailed/fedexed from the Eastern District of Virginia to INS, Lincoln, NE	Envelope containing an I-360 application and supporting documentation for beneficiary, Manuel Francia-Lopez, file # LIN 02-060-52490
19	Jun 25, 2002 mailed/fedexed from the Eastern District of Virginia to INS, Dallas, TX	Envelope containing an I-360 application and supporting documentation for beneficiary Luis A. Juarez-Rosales, file # SRC 02-211-50085
20	Aug 6, 2002 mailed/fedexed from the Eastern District of Virginia to INS, Lincoln, NE	Envelope containing an I-360 application and supporting documentation for beneficiary rendered to Zulma Valenzuela de Castillo, file # LIN 02-254 52888
21	Oct 17, 2002 mailed/fedexed from the Eastern District of Virginia to INS, Lincoln, NE	Envelope containing an I-360 application and supporting documentation for beneficiary, Arturo Vargas-Gutierrez, file # LIN 03 012 52549
22	Mar 21, 2003 mailed/fedexed from the Eastern District of Virginia to INS, Lincoln, NE	Envelope containing an I-360 application and supporting documentation for beneficiary, Alejandro Soria-Sanchez, file # LIN 03-137050116

(In violation of Title 18, United States Code, Sections 1341 and 2.)



**Count 23   Harboring Illegal Aliens**

THE GRAND JURY FURTHER CHARGES THAT:

From in or about January 2003 through in or about November 2003, in Prince William County, Virginia, in the Eastern District of Virginia, the defendants, JOSE VICENTE MENDEZ-TENIAS and the GLOBAL EVANGELISM TASK FORCE (GETF), a District of Columbia corporation, did knowingly and in reckless disregard of the fact that aliens, namely Elena Yepez Delgado, Maria Alexandra Idler Yepez, Maria Andreina Idler Yepez, and Nestor Idler Yepez, had come to, entered, and remained in the United States in violation of law, conceal, harbor, and shield from detection, such aliens in places, including buildings, specifically at 16714 Friar Loop, Dumfries, Virginia.

(In violation of Title 8, United States Code, Sections 1324 (a)(1)(A)(iii).)

A True Bill:

\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

Date: \_\_\_\_\_

PAUL J. McNULTY  
UNITED STATES ATTORNEY

\_\_\_\_\_  
Morris R. Parker, Jr.  
Assistant United States Attorney  
Chief, Major Crimes Unit

\_\_\_\_\_  
Dennis M. Kennedy  
Assistant United States Attorney